

BUFFALO-LAKE ERIE WIRELESS SYSTEMS CO., L.L.C.
4915 Auburn Avenue
Bethesda, MD 14221

November 11, 2005

Via Electronic Comment Filing System

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Semi-Annual Report
WT Docket No. 01-309
HAC Digital Wireless Telephones

Dear Ms. Dortch:

Buffalo-Lake Erie Wireless Systems Co., L.L.C. ("BLEW"), hereby files its semi-annual report in response to the Commission's Hearing Aid Compatibility *Report and Order*.¹

As background, BLEW is a small wireless carrier licensed to provide commercial wireless service in Western New York and Northwestern Pennsylvania pursuant to six broadband Personal Communications Services ("PCS") licenses.² BLEW acquired these licenses in December 2003 and launched commercial operations in August 2004. As of this writing, BLEW has approximately 8000 subscribers. BLEW has agreed to purchase its handsets from Brightpoint, Inc. and has limited ability to influence product development or selection, and must rely instead on the range of commercially available products provided. At present, BLEW sells the following makes and models of new digital CDMA wireless handsets: Nokia 6015, Nokia 6225, LG 3200, Kyocera SE14, Kyocera SoHo. To its knowledge, all of these phones meets a U3 rating under ANSI Standard C63.19.

¹ *Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones*, Report and Order, 18 FCC Rcd 16753 (2003).

² See Call Signs KNLG725, KNLG727, KNLG728, KNLG730, KNLG731, and KNLG735.

In the light of the foregoing, BLEW hereby reports the following in response to Commission requirements:

- **Item 1 – Digital Wireless Phones Tested:** BLEW is not a manufacturer, and does not purchase phones directly from vendors. Hence, to date, BLEW has not tested any digital wireless telephones for HAC-compliance.
- **Item 2 – Laboratory Used:** None. *See* Response to Item 1.
- **Item 3 – Test Results for Each Phone Tested:** Not applicable. *See* Response to Item 1.
- **Item 4 – Identification of Compliant Phone Models and Ratings According to ANSI C63.19:** To BLEW's knowledge all of the new digital handsets it sells meets a U3 rating under ANSI Standard C63.19.
- **Item 5 – Report on the Status of Product Labeling:** BLEW sells manufactured handsets that display the U-rating and information of the U-rating is provided in the packaging of the handsets as required under section 20.19(f).
- **Item 6 – Report on Outreach Efforts:** BLEW works with hearing impaired customers to select a phone most suitable to their needs. BLEW will continue and expand these efforts once phones meeting the U3 rating under ANSI standard C63.19 become commercially available.
- **Item 7 – Information Related to Retail Availability of Compliant Phones:** BLEW sells it HAC complaint handsets at its retail outlets. Handsets not in stock can be ordered from Brightpoint or shipped from another BLEW retail location.
- **Item 8 – Information Related to Incorporating Hearing Aid Compatibility Features Into Newer Models of Digital Wireless Phones:** The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the manufacturers of CDMA handsets.

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- **Item 9 -- Any Activities Related to ANSI C63.19 or Other Standard Intended to Promote Compliance with the Requirements of the Commission's *Report and Order*:** None.
- **Item 10 – Total Numbers of Complaint and Non-Compliant Phone Models Offered as of the Date of this Report:** As referenced above, BLEW currently sells five models of wireless phones. To its knowledge, all of these meet a U3 rating under ANSI Standard C63.19.
- **Item 11 – Any Ongoing Efforts for Interoperability Testing With Hearing Aid Devices:** BLEW has performed no interoperability testing to date, and will continue to rely on the phone manufacturers for all testing.

Respectfully submitted,

Buffalo-Lake Erie Wireless
Co., L.L.C.

Systems